

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL, )  
Plaintiff, )  
)  
-against- ) 20-cv-7311 (LAK)  
)  
DONALD J. TRUMP, in his )  
personal capacity, )  
Defendant. )  
\_\_\_\_\_ )

\*\*\*CONFIDENTIAL\*\*\*

VIDEOTAPED DEPOSITION OF  
E. JEAN CARROLL  
New York, New York  
Friday, October 14, 2022

Reported By:  
CATHI IRISH, RPR, CRR, CLVS

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2 outstanding.

3 Q. Outstanding what?

4 A. Outstanding that I remember them  
5 and think fondly of our time together.

6 Q. Outstanding men is what you mean?

7 A. Yes.

8 Q. How did you meet your second  
9 husband?

10 A. He was at Elaine's, I was at  
11 Elaine's. I was at the writer's table.  
12 On Thursday night all the writers in  
13 New York would in our set would gather at  
14 the table. He was at the end of the room.  
15 He happened to push back his chair and  
16 look at me and I pushed back my chair at  
17 the same time and looked at him and that  
18 was it.

19 Q. Have you ever had acting,  
20 classes, Ms. Carroll?

21 A. No, I could probably use them.

22 Q. So you met him and gave him a  
23 look and you began dating; is that  
24 correct?

25 A. He gave me a look.

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2 it.

3 Q. We can figure that out later.

4 So you left Esquire in  
5 approximately 1999; is that correct?

6 A. No.

7 Q. No.

8 A. I never left Esquire.

9 Q. Okay. I understand. Your  
10 stories weren't being picked up by Esquire  
11 around 1999; is that correct?

12 A. No, it was in the early 2000s.

13 Q. Early 2000s. And what about  
14 Elle, when did you start work for Elle  
15 magazine?

16 A. 1993.

17 Q. And how much were you making when  
18 you started at Elle, per article?

19 A. 6,000 a column.

20 Q. And at what point did you start  
21 working or getting your articles accepted  
22 by Esquire again?

23 A. That was always -- it was a  
24 stream with Esquire. It was -- writing  
25 never stopped until -- I have no idea when

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2 called America's Talking.

3 Q. And what did you do for NBC?

4 A. I had my own talk show.

5 Q. What was that talk show called?

6 A. It was based on the Ask E. Jean  
7 column so it was called Ask E. Jean.

8 Q. How much did you make from NBC  
9 for that show?

10 A. I don't remember. I don't  
11 remember. And I can't even guess.

12 Q. So you stated that up through  
13 1997 you were working for Elle, Esquire  
14 and NBC collectively; is that correct?

15 A. Yes, and there may have been  
16 other magazines that I wrote for during  
17 the time. I remember TV Guide once, maybe  
18 Glamour. I'm not sure.

19 Q. Let's go through each of them.

20 A. Oh, boy.

21 Q. Sorry. For Elle magazine, when  
22 did -- I'm trying to state this  
23 articulately, I'm not a journalist, but  
24 when did you stop getting your articles  
25 accepted through Elle magazine?

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2 website?

3 A. As I was writing the column, Ask  
4 E. Jean received hundreds of letters every  
5 month. One afternoon I had a letter in my  
6 hand from a woman who felt bad about  
7 breaking up with her boyfriend because he  
8 was such a nice guy. In this hand  
9 (indicating) I had a letter from a woman  
10 looking for a nice guy.

11 Q. You'll have to state what you  
12 mean.

13 MS. KAPLAN: In order to reflect  
14 that, Ms. Carroll moved her two  
15 fingers from each hand together, made  
16 that gesture.

17 BY MS. HABBA:

18 Q. So that's where you got the idea  
19 when you got those two separate letters;  
20 is that correct?

21 A. (Witness nodded.) Yes.

22 Q. And how long were you working  
23 with your sister?

24 A. We worked together from 2000 to  
25 2004 or 2005.

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2 is on it means it's available, wants to  
3 meet people. I didn't have that. My  
4 light was gone.

5 Q. But you had been looking on the  
6 website to see if there was anyone?

7 A. I'm always curious.

8 Q. Do you go out on dates?

9 MS. KAPLAN: Again, let's have a  
10 time frame.

11 BY MS. HABBA:

12 Q. Same time frame, let's stick with  
13 that time frame, when you sold it to The  
14 Knot.

15 A. Every once in awhile but I rarely  
16 let a new acquaintance get to the point  
17 where he would ask me out or I would ask  
18 him out.

19 Q. So you would go to dinners; is  
20 that correct?

21 A. Yes, as friends.

22 Q. Let me ask you this: Did you  
23 only date men?

24 A. Yes.

25 Q. Never dated women?

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2 A. No.

3 Q. So who was your last significant  
4 relationship that you remember?

5 A. John Johnson.

6 Q. Who was the last man you dated  
7 that you recall?

8 A. I don't remember his name.  
9 That's how significant it was.

10 Q. Do you remember approximately  
11 when?

12 A. No. It's not for lack of trying.  
13 I wanted to meet people. I just -- the  
14 music had stopped.

15 Q. Why do you think the music had  
16 stopped?

17 A. Well, looking back on it, it may  
18 have been what happened at Bergdorf's.

19 Q. Is there anything else that you  
20 think could have caused it?

21 A. Luck, not -- not meeting people  
22 that would make me want to spend time with  
23 them.

24 Q. Do you consider yourself asexual  
25 at this moment?



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2 A. No.

3 Q. So a sex drive is not the issue;  
4 is that correct?

5 A. I had no desire for desire. I  
6 don't have the desire to want sex. You  
7 have to want sex.

8 Q. Would you describe that as a sex  
9 drive for most people?

10 A. Yes.

11 Q. Have you ever tried to fix that  
12 in any way, meaning getting help?

13 A. Well, looking back perhaps maybe  
14 I should have but in my own way, I started  
15 a dating site and then I started another  
16 dating site. It's not that I was, you  
17 know, staying in the house with a shawl  
18 over my head.

19 Q. What type of men do you like?

20 MS. KAPLAN: Objection to form.

21 MS. HABBA: Generally what type  
22 of men do you like?

23 MS. KAPLAN: You can answer.

24 THE WITNESS: Men who live  
25 fascinating lives, men who are kind,

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2 men who have a great sense of humor,  
3 men who are fun to be with, men who  
4 love animals, men who love their  
5 mothers, men who like women, men who  
6 like other men, not sexually but like,  
7 you know, athletic men, adventurous  
8 men.

9 BY MS. HABBA:

10 Q. Do you like men who are  
11 successful?

12 A. Yes.

13 MS. KAPLAN: Objection to form,  
14 sorry.

15 THE WITNESS: Yes.

16 BY MS. HABBA:

17 Q. When is the last time you went  
18 out with a man -- how do I state this --  
19 in hopes of becoming more than friends?

20 A. See, that's the thing. You put  
21 your finger on it. I've never met anybody  
22 since that time where I felt that hope of  
23 wow, I hope this turns into something.

24 Q. So when is last time you had sex?

25 A. '94 or '95.

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2 Q. And how do you define sex?

3 A. Well, for what we're talking  
4 about today, I'm defining it as a man and  
5 a woman and a penis is inserted into the  
6 vagina. I'm going to show you the.

7 MS. HABBA: Complaint. We'll  
8 mark this as Exhibit P-1, please.

9 (Exhibit P-1, complaint, marked  
10 for identification.)

11 BY MS. HABBA:

12 Q. Do you recognize this document,  
13 Ms. Carroll?

14 A. Yes.

15 Q. Is this the complaint you filed  
16 against the defendant, Donald Trump? I  
17 can represent to you that this is a filed  
18 copy from the clerk.

19 A. Yes.

20 Q. In your complaint you state you  
21 met the defendant at least once before  
22 prior to the alleged attack; is that true?

23 A. Yes.

24 Q. And when did you first meet him?

25 MS. KAPLAN: Do you have that

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2 paragraph?

3 MS. HABBA: Sure. Actually I  
4 wanted her to answer the question and  
5 then I have a couple things to  
6 reference.

7 BY MS. HABBA:

8 Q. Do you remember when you first  
9 met him?

10 A. I think it was when I was a  
11 writer at Saturday Night Live.

12 Q. What year was that?

13 A. 1987. We forgot put that on the  
14 jobs list.

15 Q. We can go back to that. Thank  
16 you.

17 When did you start working with  
18 SNL?

19 A. 1987.

20 Q. 1987. And how long did you work  
21 with them?

22 A. One year.

23 Q. One year. And are there any  
24 other jobs or forms of income source that  
25 I am forgetting?

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2 is my life blood.

3 Q. And you wrote mostly about  
4 relationships; is that correct?

5 A. No.

6 Q. What did you write about usually,  
7 if there was a theme?

8 A. There was not a theme.

9 Q. Okay, fair enough.

10 So you met Donald Trump in 1987  
11 you stated; is that right?

12 A. I believe it was '87.

13 Q. Where did you first meet him?

14 A. It was at one of two parties. It  
15 was either an NBC party where John and I  
16 were going because I worked with Saturday  
17 Night Live or an ABC party where he was an  
18 anchor, so it had to be one of those two.

19 Q. And just for the record, by "he"  
20 you mean your husband John?

21 A. (Witness nodded.)

22 MS. KAPLAN: You have to say.

23 THE WITNESS: Yes.

24 MS. KAPLAN: Thank you.

25 ///

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2 BY MS. HABBA:

3 Q. Did you have any conversations  
4 with Donald Trump on that date?

5 A. Yes.

6 Q. And what was that conversation?

7 A. I don't recall it.

8 Q. Do you recall how long you spoke  
9 to Donald Trump?

10 A. Six, five, six minutes.

11 Q. Were you alone when you spoke to  
12 the former president?

13 A. No.

14 Q. Who was there?

15 A. My husband and Ivana Trump.

16 Q. Did you speak with Ivana?

17 A. Yes.

18 Q. How long did you speak to her?

19 A. It was a group conversation so  
20 five or six minutes.

21 Q. And you have no recollection of  
22 the subject matter you discussed?

23 A. It does not stand out in my mind.  
24 I remember -- I remember it was not the  
25 usual New York conversation.

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2 Q. What do you mean by that?

3 A. Wow, I love your dress, Ivana.

4 It was not that kind of conversation. It  
5 was more.

6 Q. So what you just said was not  
7 stated, it was an example of what you  
8 would --

9 A. Not I would say. The  
10 conversation was not about -- it was --  
11 because I would remember that if we talked  
12 about dresses. I would completely  
13 remember that. So it was not about that.  
14 I don't remember what it was about.

15 Q. Why would you remember if it was  
16 about a dress you think?

17 A. I always -- I usually remember  
18 details like that.

19 Q. Following the conversation, can  
20 you please tell me any other time you met  
21 Donald Trump?

22 A. He said hello to me one time on  
23 the street, waved.

24 Q. When was that?

25 A. '94 or '95.

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2 Q. Was that in New York?

3 A. Yes.

4 Q. Do you remember where in  
5 New York?

6 A. Yeah. He was standing on the  
7 side of Fifth Avenue where the Trump  
8 building is and I was across the street on  
9 Fifth Avenue.

10 Q. And what was the interaction?

11 A. Nothing. It was across traffic.  
12 He waved.

13 Q. Did he call your name?

14 A. No.

15 Q. So he was exiting Trump Tower and  
16 waved?

17 A. No, he was on that block.

18 Q. Were you alone?

19 A. Yes.

20 Q. Did you say anything?

21 A. No.

22 Q. Did you wave back?

23 A. Yes.

24 Q. And after that interaction, what  
25 was the next time you saw Donald Trump?



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2 of Donald Trump prior to the alleged  
3 attack?

4 A. I thought he was a bon vivant,  
5 man-about-town, real estate, big real  
6 estate guy, generally a positive outlook.

7 Q. Did you think he was attractive?

8 A. Yes.

9 Q. What made him attractive to you  
10 at that time?

11 A. He was tall, he was, you know,  
12 great looking. That's it.

13 Q. Did you like speaking to him?

14 A. Yes, I did, but I like speaking  
15 to you.

16 Q. Likewise. Okay, I am going to  
17 switch into the complaint so P-1 in front  
18 of you which is the complaint.

19 When exactly did Donald Trump  
20 purportedly assault you?

21 A. Say that again?

22 Q. When did Donald Trump assault  
23 you?

24 A. 80 -- the fall of 1995 or -- the  
25 fall of 1995 or the spring of '96. It was

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2 during that six- or seven-month period.

3 Q. So you don't remember which year  
4 it was; is that correct?

5 A. No, it could be either one  
6 because it's just the fall of one or the  
7 spring of the other.

8 Q. Are there any details that would  
9 lead you to believe it occurred in 1995 or  
10 1996 such as the weather that you can  
11 recall?

12 A. Yes.

13 Q. What was the weather that day?

14 A. I was wearing a wool dress and he  
15 was wearing an overcoat, and it was  
16 darkish outside so it was not in the  
17 summer because it would have been much  
18 lighter.

19 Q. What led you to isolate the range  
20 of the incident between those two years?

21 A. Because what I had on and  
22 narrowing it down as best as I could.

23 Q. Did you do anything to try and  
24 narrow it down as best as you could?

25 A. (Witness nodded.)

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2 Q. Is that a yes?

3 A. I didn't. Certainly  
4 investigators for New York Magazine and  
5 The New York Times tried to really nail it  
6 down.

7 Q. How did they try to do that?

8 A. The label on the dress, the shoes  
9 where I bought them. We all pitched in  
10 and tried to figure it out.

11 Q. Who was a part of that process?

12 A. New York Times fact-checking and  
13 New York Times, there were four reporters  
14 on the story.

15 Q. Do you remember the reporters'  
16 names?

17 A. (Witness nodded.)

18 Q. Could you please provide them?

19 A. Megan Twohey.

20 Q. Can you spell that?

21 A. Megan Twohey, Jessica Bennett,  
22 Katie Rossman and the book editor, Alter,  
23 I forget her first name.

24 Q. Can you spell that, A-L-T-E-R?

25 A. A-L-T-E-R, Alexandra Alter.

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2 A F T E R N O O N S E S S I O N

3 (Time noted: 12:45 p.m.)

4 E. J E A N C A R R O L L, resumed  
5 and testified as follows:

6 THE VIDEOGRAPHER: The time is  
7 12:45 p.m. We're back on the record.  
8 You may proceed.

9 CONTINUED EXAMINATION

10 BY MS. HABBA:

11 Q. I'll just remind you that you are  
12 still under oath, as you know.

13 Let's discuss the complaint. You  
14 stated that you had left work and went to  
15 Bergdorf Goodman; is that correct?

16 A. Yes.

17 Q. And where was work?

18 A. Work was in -- across the river,  
19 across the George Washington Bridge in  
20 Fort Lee, New Jersey. It was an NBC  
21 adjunct.

22 Q. Why did you go to Bergdorf?

23 A. Bergdorf has great sales.

24 Q. Was there a sale at that point?

25 A. I don't remember but I think that

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2 Q. Was there anybody you were  
3 particularly friendly with?

4 A. Carol Martin.

5 Q. Was Carol Martin at work on the  
6 day in question?

7 A. No.

8 Q. No?

9 A. I don't know.

10 Q. You don't know if she was at  
11 work?

12 A. I don't know.

13 Q. Did you have any plans that day  
14 following your visit to Bergdorf's?

15 A. I can't recall.

16 Q. Okay, were you planning on  
17 meeting -- you don't recall if you were  
18 planning on meeting anyone?

19 A. I cannot recall.

20 Q. Did you typically go to Bergdorf  
21 after work?

22 A. No.

23 Q. Did you buy anything at Bergdorf  
24 that day?

25 A. I suspect not because I don't

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2 remember having packages or a carrier bag.

3 Q. Did you have dinner after  
4 Bergdorf that day?

5 A. No, I couldn't eat.

6 Q. Did you see anyone after Bergdorf  
7 that day?

8 A. No.

9 Q. Were you dating anyone at this  
10 time?

11 A. Not that I recall.

12 Q. Do you recall having any  
13 boyfriends during the time period from  
14 spring of the fall of '95 until spring of  
15 '96?

16 A. There may have been chaps  
17 floating around in the atmosphere. There  
18 may have been some interest but boy, I  
19 cannot remember specifically. No.

20 Q. Do you remember the last person  
21 you slept with prior to this incident?

22 A. Yes.

23 Q. Who was that?

24 A. John Johnson.

25 Q. Do you remember how long ago that

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2 A. I was leaving the store. He was  
3 coming in. He held up his hand as I was  
4 coming out so I stopped and he came in and  
5 he said hey, you're that advice lady.

6 Q. Did you respond to him at that  
7 time?

8 A. I said something like hey, you're  
9 that real estate tycoon.

10 Q. Had he ever previously referred  
11 to you as the advice lady?

12 MS. KAPLAN: Objection to form.

13 BY MS. HABBA:

14 Q. That you know of, I should say.

15 A. I don't know if he has or not.

16 Q. Had you ever heard him call you  
17 that in your prior encounters?

18 A. No.

19 Q. Did he gesture at you in any way  
20 when he saw you?

21 A. Put up his hand to stop me from  
22 going out when he was coming in.

23 Q. Was it a revolving door?

24 A. Yes.

25 Q. So he was on the other side of

1 CARROLL - CONFIDENTIAL

2 the revolving door when he put his hands  
3 up?

4 A. He was outside.

5 Q. Just have the record reflect  
6 she's putting her hand up.

7 Was defendant accompanied by  
8 anyone when he was walking in?

9 A. No.

10 Q. Did he have security?

11 A. No.

12 Q. When you had seen the defendant  
13 prior times, did he have security?

14 A. I didn't see any security.

15 Q. Did anyone else recognize the  
16 defendant when he came in?

17 MS. KAPLAN: Objection to form.

18 If you know.

19 THE WITNESS: One shopper and a  
20 sales attendant.

21 BY MS. HABBA:

22 Q. I'm just going to back up really  
23 quickly. So he was outside the revolving  
24 door; is that correct?

25 A. (Witness nodded.)



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2 MS. KAPLAN: I'm so sorry.

3 MS. HABBA: She's nodding.

4 THE WITNESS: Yes.

5 BY MS. HABBA:

6 Q. You were inside the revolving  
7 door?

8 A. Yes. I was inside Bergdorf's.

9 Q. So when he put his hand up, you  
10 were inside the store and he was outside  
11 the store; is that correct?

12 A. Yes, yes, because I was heading  
13 out through the revolving door. He was  
14 coming in so to stop me from coming out  
15 the door he went like this (indicating).

16 Q. And put up his hand, for the  
17 record.

18 Why did you stop?

19 A. It's the international symbol.  
20 It was aimed at me so I stopped.

21 Q. Were there other people walking  
22 through the revolving door?

23 A. There were very, very few people  
24 in the store.

25 Q. Why was that, if you know?

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2 A. It was evening. It was 6:30,  
3 probably going on 7.

4 Q. What happened after he went  
5 through the revolving door?

6 A. He said hey, you're that advice  
7 lady, and then he said come help me buy a  
8 present.

9 Q. And what did you say?

10 A. I was delighted.

11 Q. Why were you delighted?

12 A. I'm an advice columnist, this is  
13 my duty.

14 Q. Were you delighted because it was  
15 Donald Trump?

16 A. It was a New York scene with  
17 Donald Trump asking me to help advise him  
18 on getting a present.

19 Q. If it had been anyone other than  
20 Donald Trump, would you have done it?

21 A. Absolutely, yes.

22 Q. So you said somebody recognized  
23 Donald Trump at that time; is that  
24 correct?

25 A. Yes.

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2 Q. You mentioned two people; is that  
3 right?

4 A. (Witness nodded.)

5 Q. Can you explain to me when that  
6 happened?

7 A. I said handbags. Handbags, that  
8 would be perfect. So we entered, we  
9 walked, we started walking and he was  
10 going to have no part of the handbag  
11 thing, so then I said hats because at the  
12 time hats and handbags were fairly close,  
13 actually mixed together.

14 Q. Was this on the ground floor of  
15 Bergdorf?

16 A. Um-hum.

17 Q. When did the first person  
18 recognize Donald Trump?

19 A. Well, we were looking at --  
20 heading towards the handbags in the area.  
21 She gaped up at him.

22 Q. She being a customer or the  
23 person that worked there?

24 A. No, customer.

25 Q. Customer. Did she say anything

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2 A. I do not recall anything specific  
3 that she said. She seemed very pleased to  
4 see him.

5 Q. Did she help either of you?

6 A. No, we walked past her.

7 Q. Did he acknowledge her?

8 A. In the '90s, he seemed to be very  
9 friendly to people so he was like nodding.

10 Q. Do you recall any defining  
11 characteristics of the person that helped  
12 in the hat or handbag section?

13 A. (Witness nodded.) No.

14 Q. So what happened next?

15 A. I wish I did.

16 Q. So what happened next?

17 A. I had suggested a handbag, he was  
18 not interested in the handbag. Oh, before  
19 that, I said who is the present for? And  
20 he said a girl. And that's why I  
21 suggested handbags and he wouldn't do that  
22 so I said hats, you can't go wrong with a  
23 hat. Look at the hats. So we went to the  
24 hats.

25 Q. And I believe you had stated in

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2 your book, which we'll talk about, that he  
3 went to a fur hat; is that correct?

4 MS. KAPLAN: You have to say.

5 THE WITNESS: Yes, he went right  
6 for the fur hat and was petting it.  
7 That is a vision. He had it in his  
8 hand.

9 BY MS. HABBA:

10 Q. And then what happened?

11 A. He asked me how old I was.

12 Q. And your response to that was  
13 what?

14 A. 52.

15 Q. And what happened after that?

16 A. He told me how old I was. He  
17 said you're so old.

18 Q. And what did you say in response  
19 to that, if anything?

20 A. I do not recall but I hope it was  
21 something saucy.

22 Q. And what happened after that?

23 A. Then he got the idea of lingerie.

24 Q. How do you know that?

25 A. Because he said lingerie. He

1 CARROLL - CONFIDENTIAL

2 said I know, lingerie.

3 Q. Did you ask him to identify the  
4 girl that he was shopping for?

5 A. In a roundabout way.

6 Q. What does that mean?

7 A. I asked him how old she was,  
8 that's why he asked me how old I was.

9 Q. Did he answer your question?

10 A. No.

11 Q. So the hat and the bags were on  
12 the ground level; is that correct?

13 A. Yes.

14 Q. At that point did you leave the  
15 ground floor?

16 A. Yes.

17 Q. And where did you go?

18 A. After he said I know, lingerie,  
19 we went up the escalator.

20 Q. Do you know what floor you went  
21 to?

22 A. I don't recall but it seems to me  
23 it was like the sixth floor. It was a  
24 long ride.

25 Q. And there was nobody else but the

1 CARROLL - CONFIDENTIAL

2 layout of the floor with the lingerie on  
3 it once you got there?

4 A. From memory, now I had been in  
5 Bergdorf's after this so my vision may be  
6 prejudiced but I remember it was on the  
7 floor with the cruise section, you know,  
8 vacation clothes, bathing suits, and I  
9 think evening gowns.

10 Q. Do you remember if the lingerie  
11 was close to the escalator when you got  
12 off?

13 A. No, we walked to get there.  
14 That's why I'm clear that there was nobody  
15 on the floor, nobody.

16 Q. When you say nobody on the floor,  
17 you mean not even customers?

18 A. Not even customers.

19 Q. So what happens next once you get  
20 to the lingerie section?

21 A. There's a -- as you enter the  
22 lingerie section on the left there's a  
23 counter and on the counter were three or  
24 four boxes and there was nobody there.  
25 And on the counter was a body suit,

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2 see-through body suit with a little bit of  
3 lace on it and he picked it up.

4 Q. So that body suit was just on the  
5 counter, it wasn't hanging with the other  
6 lingerie?

7 A. No, when we were there, there  
8 were no racks, it was just boxes, things  
9 were put under a counter, a glass counter.

10 Q. What do you mean by boxes?

11 A. Boxes that held, you know, pretty  
12 frilly little items.

13 Q. So was everything on shelves in  
14 the lingerie department?

15 A. I only remember the counter.

16 Q. The counter, when you say the  
17 counter, you mean the counter where you  
18 would check out; is that right?

19 A. Um-hum.

20 Q. And there was one piece of  
21 lingerie on that counter?

22 A. Yeah, and a couple of boxes and  
23 there may have been lingerie hanging over  
24 the right on the racks, I didn't see it.

25 Q. And there was no one on that



1 CARROLL - CONFIDENTIAL

2 It was a counter with boxes and a body  
3 suit.

4 BY MS. HABBA:

5 Q. Did the counter display items in  
6 it?

7 A. I don't remember seeing things  
8 displayed but I don't remember.

9 Q. So what happened after he picked  
10 up the lingerie?

11 A. He snatched it up and he said go  
12 put this on.

13 Q. What happened then?

14 A. I said you put it on, it's your  
15 color.

16 Q. What color was it?

17 A. Gray blue.

18 Q. Gray blue. Do you remember the  
19 brand?

20 A. No. It was a very beautiful  
21 piece of lingerie though.

22 Q. What did it look like?

23 A. See-through, lilac grayish-blue  
24 edged with a little bit of lace, very  
25 pretty.

1 CARROLL - CONFIDENTIAL

2 Q. And what type of lingerie was it?

3 A. It was a one-piece body suit.

4 Q. So what happened next?

5 A. He threw it back at me and he  
6 said go put this on.

7 Q. Did he hand it to you?

8 A. No, he threw it at me. So I  
9 tossed it back to him and said it goes  
10 with your eyes.

11 Q. Did he catch it?

12 A. Yeah, he caught it like this  
13 (indicating).

14 Q. She can't, she has to articulate.

15 A. He held it like this  
16 (indicating).

17 MS. KAPLAN: Videographer, are  
18 you getting this all on the video?

19 THE VIDEOGRAPHER: Yes.

20 BY MS. HABBA:

21 Q. He caught it and held it to his  
22 chest, is that what you're doing with your  
23 hands?

24 A. He went like this and then he  
25 held it against my chest and said you're

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2 in good shape, this looks like it might  
3 fit you.

4 Q. Okay. And then what happened?

5 A. And then I said but it's your  
6 size. This was banter. We're going back  
7 and forth. He's saying put this on, I'm  
8 saying you put it on. He's saying -- I  
9 thought it was an enjoyable repartee.

10 Q. And when you say it was his size,  
11 was it a large size piece of lingerie?

12 A. It was a joke to say that.

13 Q. Okay. I just want to clarify for  
14 the record.

15 A. No, it was not a huge piece.

16 Q. What happened next?

17 A. And then I said it's your size  
18 and he took my arm and he said let's go  
19 put this on, and I started laughing  
20 because I'm thinking to myself this is  
21 hilarious, I'm going to make him put it on  
22 over his pants. That's my plan. And then  
23 after I make him put it on over his pants  
24 I'm going to have a story that I can tell  
25 my friends at dinner.

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2 dressing room was open?

3 A. Because the door was open.

4 Q. Were the other doors closed?

5 A. I don't have a vision of it. I  
6 cannot call it up. I can't call it up.

7 Q. How do you know that there wasn't  
8 somebody in the dressing rooms?

9 A. I don't know that.

10 Q. Did you hear anybody?

11 A. No.

12 Q. So what happened after he  
13 gestured with his hand for you to go into  
14 the dressing room?

15 A. It's all one action. I stepped  
16 into the room, the door was banged closed  
17 and he pushed me up against the wall.

18 Q. I'm just going to slow you down,  
19 I apologize, I'm sure this is difficult to  
20 talk about but the door was banged you  
21 said. Did he slam the door?

22 A. He closed it (indicating).

23 Q. With force?

24 A. He closed it.

25 Q. Did it have a lock on it?

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2 A. I have no idea.

3 Q. Do you remember him locking the  
4 door?

5 A. No, I don't believe he locked the  
6 door.

7 Q. Was this a wood door that would  
8 have hidden the entire room?

9 MS. KAPLAN: Again you have to  
10 say.

11 THE WITNESS: I'm just still  
12 thinking about your last question.  
13 I'm sure he didn't lock it because he  
14 immediately pushed me up against the  
15 wall so hard that I banged my head so  
16 I don't think he was locking it.

17 BY MS. HABBA:

18 Q. Was there a mirror in the room?

19 A. Yes.

20 Q. Where was the mirror in relation  
21 to where your head was?

22 A. It was right, there was a chair  
23 on the left and I was pushed up against  
24 the wall (indicating). If the mirror is  
25 here and the chair is here, this wall,

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2 when you walked in and that's where he  
3 allegedly pushed you against the wall?

4 MS. KAPLAN: Again you have to  
5 say.

6 THE WITNESS: Yes, yes.

7 BY MS. HABBA:

8 Q. Okay.

9 A. There may have been a second  
10 mirror but that also may have been a  
11 window, I can't remember.

12 Q. Do you remember what the  
13 furniture looked like in that room?

14 A. I remember there was a chair and  
15 a table, a little tiny table and that's  
16 all I remember.

17 Q. Do you remember what the carpet  
18 was?

19 A. No.

20 Q. Okay, so after you bumped your  
21 head, did you say anything?

22 A. I was so shocked that I didn't  
23 speak. What I did was I laughed.

24 Q. Where did you bump your head  
25 exactly?

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2 A. Right in the back of it.

3 Q. In the center of it?

4 A. Yes.

5 Q. Did it hurt?

6 A. It hurt. It jolted me and then  
7 he pushed me back again and I hit it again  
8 for a second time.

9 Q. Was it loud?

10 A. Inside my head, I remember  
11 hearing a bang but...

12 Q. Would somebody have heard it if  
13 they were in the dressing room next door?

14 A. Yes.

15 Q. Would an attendant have heard it  
16 if they were outside the dressing room?

17 A. An attendant would have heard, I  
18 believe so.

19 Q. What happened next?

20 A. An attendant would have heard me  
21 laughing loudly.

22 Q. I know you've addressed this  
23 numerous times publicly but why were you  
24 laughing?

25 A. Shock. Trying to recapture the

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2 camaraderie we had and sort of a feeling  
3 of a lark, we're on a lark, we're having  
4 an adventure, it's a lark, trying to  
5 recapture that and take it out of the  
6 realm where he had entered, trying to  
7 reduce any eroticism about it.

8 Q. Was it erotic?

9 A. Not to me.

10 Q. Was he angry?

11 A. No.

12 Q. What was his demeanor?

13 A. Intent.

14 Q. In any manner did the defendant  
15 lunge at you?

16 A. When he pushed me up against the  
17 wall, he lunged at me and pushed me up  
18 against the wall.

19 Q. What happened next?

20 A. I hit my head twice and then he  
21 had his hands on my arms, pushed me back a  
22 second time, hit my head and then he put  
23 his shoulder into me, and he's a big man.  
24 He's -- and he -- guessing 220, maybe 225  
25 at the time. I weighed 120. He was 100



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2 more pounds. And that was one of the  
3 things that went through my mind was how  
4 big and heavy he was because his whole  
5 weight came, his shoulder came into me and  
6 so at this point I realized it was  
7 serious. I was shocked before because he  
8 put me against the wall but now I  
9 understood that this is -- this is a  
10 battle, and he pulled down my tights.

11 Q. Did you feel like he was trying  
12 to hurt your head when he --

13 A. No, no. No. He was not trying  
14 to hurt me. He was trying to rape me and  
15 it was -- it was a situation which I never  
16 would have -- when it went from good humor  
17 joshing into being up against the wall and  
18 then having that heavy weight against me.

19 Q. What did he do after that?

20 A. He pulled down my tights.

21 Q. Had you said anything at this  
22 point?

23 A. I cannot believe that I didn't  
24 say anything but I don't remember that I  
25 said anything. That doesn't mean I didn't

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2 say anything but I -- I can't imagine  
3 being quiet. I can't imagine not saying  
4 anything but I can't remember saying  
5 anything.

6 Q. Did you scream?

7 A. No.

8 Q. Did you push him?

9 A. Yes.

10 Q. Where?

11 A. I had my purse in this hand.

12 Q. In your right hand?

13 A. Right hand. And I tried to get  
14 my arms up to push him back, to push him  
15 back. The problem was I couldn't get my  
16 knee up because the pantyhose had been  
17 taken down.

18 Q. So he had hit your head twice  
19 prior to taking your pantyhose off  
20 according to you; right?

21 A. He didn't take the pantyhose off.

22 Q. He did not?

23 MS. KAPLAN: Again --

24 THE WITNESS: No, he did not take  
25 the pantyhose off.

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2 BY MS. HABBA:

3 Q. Okay. So what happened?

4 A. Pulled them down.

5 Q. And then what happened?

6 A. And then I felt his fingers  
7 rummaging around my vagina and this huge  
8 weight against me. My head hurt, this  
9 huge weight, I'm in a situation where I  
10 can't -- I can't -- at one point I  
11 remember saying this is Donald Trump, what  
12 the heck is going on? And then I felt his  
13 penis inside of me.

14 Q. So sorry to get into details  
15 but --

16 A. No, I understand.

17 Q. If you're against the wall, it  
18 was his right shoulder that you are  
19 describing was pushing into you?

20 A. Left, I think.

21 Q. His left shoulder, sorry, because  
22 you did touch your left side so I assumed  
23 it was the right. So it was his left  
24 shoulder and he used his right hand?

25 A. I don't know. I couldn't see his

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2 Q. How long did that last?

3 A. Very short time.

4 Q. Approximately how long do you  
5 think?

6 A. Very brief. It was very brief.

7 Q. And then what happened?

8 A. I managed to get my knee up and  
9 push off and get him out and push off.

10 Q. And then what happened?

11 A. I went out the door and went  
12 away.

13 Q. So before you went out the door,  
14 did you put your tights back on?

15 A. No, they were never off.

16 Q. I'm not following, I guess, how  
17 he managed to put his fingers on you and  
18 have sex with you if he never took them  
19 off.

20 A. He pulled them down.

21 Q. He pulled them down. So did you  
22 pull them up at any point?

23 A. I don't remember pulling them up  
24 but I must have.

25 Q. So when this was done you pulled

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2 is that correct?

3 A. Yes.

4 Q. Thank you. So when you pushed  
5 him off with your knee, did he back off of  
6 you?

7 A. Well, I pushed him with hands and  
8 knee and I didn't look to see what he was  
9 doing. I turned and got out.

10 Q. Did you scream?

11 A. No.

12 Q. Did you say anything to him?

13 A. No.

14 Q. Did you look at him?

15 A. No, I didn't.

16 Q. Did you kiss him at any point  
17 when you were in the dressing room?

18 A. When he -- when we first came in,  
19 when he first shoved me against the wall,  
20 lunged and shoved me back and I hit my  
21 head, he put his mouth against mine.

22 Q. Did you kiss him back?

23 A. I was so shocked I was laughing.

24 Q. When he was kissing you?

25 A. Yes, because I thought this is --

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2 this is -- this is not kosher. I suddenly  
3 realized.

4 Q. So you turned around and leave  
5 the dressing room and what do you do?

6 A. I believe I went down the  
7 escalator which would have been a long  
8 ride but I can't imagine finding the  
9 elevator, you know, pressing the button.  
10 I don't remember that. I do remember  
11 going and having the fear that he may --  
12 may be coming after me, just slightly in  
13 the back of my head.

14 Q. You were worried he would chase  
15 you; is that correct?

16 A. (Witness nodded.)

17 MS. KAPLAN: Again, let's get the  
18 answer.

19 THE WITNESS: Not chase but come  
20 after me.

21 BY MS. HABBA:

22 Q. What do you mean by that?

23 A. Just follow me, maybe grab me  
24 again.

25 Q. Did you feel at any point that he

1 CARROLL - CONFIDENTIAL

2 the elevator?

3 A. Right.

4 Q. Do you recall which exit you left  
5 from at Bergdorf?

6 A. Not the specific one but it was  
7 on Fifth Avenue.

8 Q. Was the street crowded when you  
9 exited?

10 A. Not very.

11 Q. Was it dark?

12 A. Yes.

13 Q. What did you do after you left?

14 A. Called Lisa Birnbach.

15 Q. Who is Lisa Birnbach?

16 A. She's my friend and I had an  
17 overwhelming urge to call and say you're  
18 not going to believe what just happened to  
19 me.

20 Q. How long were you friends with  
21 Ms. Birnbach prior to the attack?

22 A. We met in '90 or '89 so four or  
23 five years.

24 Q. And how often would you speak  
25 with her prior to the attack?

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2 Q. Where were you standing when you  
3 called Ms. Birnbach?

4 A. On Fifth Avenue.

5 Q. Were you right outside Bergdorf?

6 A. (Witness nodded.)

7 Q. How long was that phone call?

8 A. I don't know.

9 Q. Do you remember --

10 A. It was not brief but it was not  
11 long.

12 Q. Do you remember the content of  
13 that conversation?

14 A. Lisa remembers more about it than  
15 I do. I remember calling her. And I  
16 remember Lisa suggesting I go to the  
17 police and also Lisa suggesting that she  
18 go to the police with me and that idea was  
19 so, such a terrible -- I couldn't picture  
20 myself going to the police so I shut that  
21 down.

22 Q. How did you shut that down?

23 A. No, I'm not going to the police.

24 Q. At any point were you crying on  
25 that phone call?



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2 A. No.

3 Q. Do you recall what your  
4 disposition was on that phone call?

5 A. I was in shock and disordered. I  
6 felt unbalanced which was a strange  
7 feeling for me.

8 Q. When you say unbalanced were you  
9 actually physically unbalanced?

10 A. Yes.

11 Q. Did you sit down at any point  
12 or --

13 A. No.

14 Q. Did you need to get a water or do  
15 anything to take care of yourself after  
16 that moment?

17 A. No, what I wanted to do, I needed  
18 to talk to somebody, talk to Lisa. Then I  
19 just wanted to go home.

20 Q. Is that what you did?

21 A. (Witness nodded.)

22 Q. So did you go to a parking garage  
23 to get your car or did you go straight  
24 home?

25 A. The parking garage.

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2 MS. KAPLAN: Are you talking  
3 about at any point in time?

4 MS. HABBA: Outside of the  
5 litigation, of course, prior to the  
6 litigation.

7 THE WITNESS: No, we agreed right  
8 then and there this is it. I didn't  
9 want to talk about it ever again,  
10 ever. That was it, and I didn't want  
11 to hear about it ever again. I was  
12 embarrassed, I was ashamed at this  
13 point. I was raped, this is like --  
14 this was shocking and so I just said  
15 let's never talk about this again.

16 BY MS. HABBA:

17 Q. Let's talk about that word  
18 "rape." You had stated, and I'm happy to  
19 pull it up or just say, you had stated  
20 prior that you didn't like using the word  
21 "rape." Do you recall that?

22 A. I recall feeling that.

23 Q. Why did you feel that way?

24 A. The word to me means something  
25 that generally speaking a man does to a

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2 woman, that she's powerless, that he has  
3 the power over her, rape. It means he's  
4 taken something from her and I didn't view  
5 it that way. I viewed it what went on in  
6 that dressing room as a fight.

7 Q. Did you feel like you won that  
8 fight?

9 A. I don't think there are any  
10 winners there.

11 Q. On that day you got in your car  
12 and drove home; is that correct?

13 A. (Witness nodded.)

14 Q. And you didn't speak to any other  
15 family members or friends throughout the  
16 night?

17 A. No, by this time I realized -- I  
18 didn't want to talk to anybody about it.

19 Q. Approximately what time did you  
20 get home?

21 A. I have no idea.

22 Q. Did you stop anywhere on your way  
23 home?

24 A. No.

25 Q. What did you do when you got

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2 the attack?

3 A. The next day I certainly remember  
4 the pain in my head. Then went to work.

5 Q. Normal time?

6 A. I don't know.

7 Q. But you don't recall calling out  
8 sick; is that correct?

9 A. No, no, no, no, I would never.

10 Q. Did you tell anybody at work what  
11 happened?

12 A. Yes, I told Carol Martin.

13 Q. When did you tell Carol Martin?

14 A. The next day or the day after.

15 Q. How did you tell her?

16 A. Well, it was strange because I  
17 promised I would never tell anybody and I  
18 told Lisa to never tell anybody and the  
19 first thing I do is see Carol Martin at  
20 work and I say I have to tell her. And it  
21 was backstage. We both did our shows in  
22 the same studio. We met backstage. I  
23 said I've got to talk to you. I gave her  
24 a few details and she said let's talk at  
25 my house tonight so we met at her house

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2 Q. How were you aware of that?

3 A. She was a New York anchorwoman at  
4 CBS and she, you know, she was one of the  
5 great anchors during the '80s and she  
6 would tell the audience about the lawsuits  
7 against the former president on racism and  
8 she just didn't like him.

9 Q. Were there lawsuits that she had  
10 been reporting on about him prior to this  
11 time?

12 A. If you're reading the news, she  
13 was giving the news, she also wrote the  
14 news, and reporting on her New York  
15 audience and he was definitely a news  
16 maker and she, you know, if you're a  
17 reporter in New York in those days you did  
18 a lot of reporting about him.

19 Q. What did Ms. Martin say to you?

20 A. She said tell no one, he's got  
21 200 lawyers, he'll bury you.

22 Q. And what did you respond?

23 A. I said I agree.

24 Q. And what happened after that?

25 A. That was it. Then we rehashed

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2 the whole thing again, went back to it  
3 again, and that was it.

4 Q. Why did you take Ms. Martin's  
5 advice over Ms. Birnbach's?

6 A. I just would not go to the police  
7 about something that happened to me like  
8 this. After Lisa said this is assault, it  
9 was rape, I didn't want to talk to anybody  
10 or tell the police. I just didn't -- it  
11 was just something that I would keep to  
12 myself.

13 Q. Why didn't you tell the police  
14 about what happened with your ex-husband  
15 John?

16 A. I would never think of it.

17 Q. Why is that?

18 A. I always feel I can handle things  
19 myself.

20 Q. After speaking with Ms. Martin,  
21 did you tell anybody else about the attack  
22 outside of related to this litigation?

23 A. No.

24 Q. Did you visit any doctors?

25 A. No.

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2 why was -- let me scratch that.

3 During the last two decades, have  
4 you ever interacted with the defendant  
5 again directly?

6 A. No.

7 Q. Were you aware that the  
8 president -- that the defendant was a  
9 presidential candidate prior to the 2016  
10 election?

11 A. Yes.

12 Q. And are you aware that he ran in  
13 2000 as a potential member of the reform  
14 party?

15 A. No.

16 Q. Did you ever consider coming  
17 forward with your account prior to #MeToo?

18 A. Never.

19 Q. Why not?

20 A. Just -- I'm going to say  
21 something that even surprises me because  
22 women who have been raped are looked at in  
23 this society as less, are looked at as  
24 spoiled goods, are looked at as rather  
25 dumb to let themselves get attacked. I

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2 mean even you have to say did you scream?

3 I mean every woman who admits to being  
4 attacked has to answer that question, why  
5 didn't you scream, why did you come  
6 forward when you did, why didn't you come  
7 forward before and so no, I didn't -- I  
8 would have been fired.

9 Q. How did you feel when you found  
10 out that the defendant announced he was  
11 running for president in 2016?

12 A. I thought oh, boy.

13 Q. What does oh, boy mean?

14 A. Just almost disbelief and a  
15 little bit of heartache. I felt really  
16 bad, you know.

17 Q. Why did you feel bad?

18 A. I didn't think he would be a good  
19 candidate.

20 Q. Why didn't you come forward with  
21 your account at that time?

22 A. I was with my mother in  
23 Bloomington, Indiana. She was on her  
24 deathbed. She was a feisty redheaded  
25 Scottish woman, republican politician, so



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2 we gathered around for her last weeks.

3 Q. Did you think she would be upset  
4 if she heard the allegations against  
5 Donald Trump?

6 A. That's all she needed to hear on  
7 her death bed. Well, I was worried that  
8 it would ruin her last days and I just  
9 couldn't have done it. I just wouldn't  
10 have done it.

11 Q. Do you know if your mother  
12 supported Donald Trump for president in  
13 2016?

14 A. I wish you could have been there  
15 when she was in hospice, every nurse that  
16 came in she gave the talk about Hillary is  
17 going to pay for your kids' college  
18 education so she was a feminist from the  
19 cradle. She was a great feminist so she  
20 was a total Hillary person.

21 Q. But you had stated prior which is  
22 why I asked that she was --

23 A. Republican.

24 Q. -- a republican. Was that the  
25 first time --

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2 A. She also voted for Obama. We all  
3 made a big deal about it.

4 Q. Why was that?

5 A. It was a sea change.

6 Q. That was the first time that she  
7 changed her politics as far as you knew?

8 A. First time she told us.

9 Q. Would you have come forward  
10 sooner if you thought Donald Trump  
11 wouldn't become president if you spoke out  
12 about your account?

13 MS. KAPLAN: Objection to form  
14 but you can answer.

15 THE WITNESS: No, because I  
16 believe that the women who were coming  
17 out were helping him, helping.

18 BY MS. HABBA:

19 Q. What do you mean by helping him?

20 A. As more and more women came  
21 forward with accusations against the  
22 former president, his popularity seemed to  
23 go up.

24 Q. Was that part of why you didn't  
25 come out?

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2 A. Only a very, very small part.

3 Q. So if you had known that it would  
4 have made him less popular, to say it  
5 differently, would you have come out?

6 A. I know that it wouldn't have made  
7 him less popular. It would have made him  
8 more popular.

9 Q. And that was part of the reason  
10 you didn't come out with it; is that  
11 correct?

12 A. Yeah, I was --

13 MS. KAPLAN: Objection to form.  
14 You can answer.

15 THE WITNESS: I was -- didn't  
16 think it was -- I knew it would help  
17 him. I didn't want to get fired from  
18 Elle and I didn't want to lose my  
19 reputation and I didn't want to be  
20 looked at as soiled goods or stupid to  
21 go get yourself attacked in  
22 Bergdorf's. It was not something I  
23 would want to talk about.

24 BY MS. HABBA:

25 Q. Did you follow the polling prior

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2 A. I would never tell my mother,  
3 never tell my mother.

4 Q. How about your sisters?

5 A. No, never told them.

6 Q. And your brother?

7 A. No. We're close but we don't  
8 tell each other that kind of thing.

9 Q. If it wasn't for the #MeToo  
10 movement, do you think you would have  
11 spoken out against the defendant?

12 A. No, I don't think I would have.

13 Q. Why is that?

14 A. It's just as it was the perfect  
15 storm.

16 Q. Did you consult with anyone prior  
17 to making your decisions?

18 A. No, no.

19 Q. So when exactly did you decide to  
20 recount this alleged attack with Donald  
21 Trump?

22 A. I went on a road trip to write a  
23 book called What Do We Need Men For. I  
24 started the book because over the 26 years  
25 that I was writing the column, almost

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2 every single letter, whether it was about

3 career or finances or children or romance,

4 there was always a complaint about a man.

5 So I spent 26 years saying get rid of him,

6 get rid of him. So I thought why don't I

7 just go on the road and ask women what do

8 we need men for and let them tell me so I

9 don't go through with my idea which is to

10 put them, all the men, in Montana. That

11 was the idea. That was what I was going

12 to do. It had nothing to do with Donald

13 Trump, nothing, and then the first day of

14 the trip started. My intention was to go

15 to towns named after women, only wear

16 clothes designed by women, only eat in

17 restaurants like Betty's Cafe run by women

18 or owned by women, only listen to books by

19 women in the car, listen to music by

20 women. That was the whole thing. I get

21 out of the car when I got to the small

22 town and talk to the people, what do we

23 need men for. I was getting fabulous

24 answers. But the same day it started the

25 Harvey Weinstein story broke and if you

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2 remember, the flood of stories that  
3 started as women started standing up.

4 Q. How much of your coming out with  
5 this story --

6 MS. KAPLAN: Were you done with  
7 your answer?

8 MS. HABBA: I'm sorry.

9 THE WITNESS: But I didn't decide  
10 to do --

11 MS. HABBA: My apologies.

12 THE WITNESS: -- to talk about  
13 the incident in Bergdorf's. I was  
14 making a list. Many other men were on  
15 it but he wasn't on it. I didn't make  
16 that decision to include him until  
17 four or five weeks into writing the  
18 book.

19 BY MS. HABBA:

20 Q. What turned you on making that  
21 decision or who if there was a reason?

22 A. Well, the book --

23 MS. KAPLAN: Objection to form.  
24 You can answer.

25 THE WITNESS: What we're talking

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2 about here is 11 pages of a book. A  
3 book is this thick (indicating) and  
4 that part was just this part  
5 (indicating) so he was one of the  
6 hideous men in my life so I finally  
7 put him in and I wrote it just as a  
8 part of this long string of hideous  
9 men I've run into in my life. So it  
10 was not written with him to head the  
11 list or he's the most hideous, no, he  
12 was not an afterthought but I didn't  
13 completely decide until I was into the  
14 book.

15 BY MS. HABBA:

16 Q. And who did you first discuss  
17 putting him in the book with?

18 A. Nobody.

19 Q. At some point I assume you had to  
20 make that editorial change; correct?

21 A. No, I was writing chapters and  
22 switching them around and when I was  
23 getting ready for the proposal, I had to  
24 send an e-mail to my agent saying by the  
25 way, you're going to be surprised, and

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2 attacked so I called the police.

3 Q. Was that the only time you've  
4 called the police?

5 A. (Witness nodded.)

6 Q. You also claimed that a girl  
7 scout leader sexually abused you every day  
8 for a two-week period when you were 12; is  
9 that correct?

10 A. Yes.

11 Q. Did you bring that up to anyone  
12 previously or report this --

13 A. Never --

14 Q. Sorry, I have to finish my  
15 question -- or report this alleged  
16 assault?

17 A. To people who know me, this was a  
18 shocking revelation in this book. It  
19 wasn't about the former president, it was  
20 about camp because so many of my friends  
21 had been to that camp and I heard from  
22 women across the United States he did the  
23 same thing to, you know. That attack has  
24 stayed with me every day.

25 Q. And in not coming forward



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2 ever expect anything. So what I said, I  
3 didn't think he would deny it. I thought  
4 he would just say it didn't happen that  
5 way. She agreed to it or it was  
6 consensual sex.

7 Q. Wouldn't that have been him  
8 saying that you were a liar?

9 A. No, it would have been him saying  
10 yeah, it happened and then we could have  
11 disagreed and then I could have vehemently  
12 said no, I did not consent.

13 Q. Would you have sued him if that  
14 is what happened?

15 A. I have no idea.

16 Q. If someone felt that they were  
17 wrongfully accused of an egregious  
18 conduct, would you expect them not to deny  
19 it?

20 MS. KAPLAN: Objection to form.

21 THE WITNESS: It depends on what  
22 happened. If it's obvious that it  
23 happened.

24 BY MS. HABBA:

25 Q. Do you think this was obvious?

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2 MS. KAPLAN: Objection to form.

3 THE WITNESS: Again, I just was  
4 shocked that he absolutely denied it  
5 because he was there and he denied it.  
6 That's what gets me every time. He  
7 was there, he denied it.

8 BY MS. HABBA:

9 Q. Was Les Moonves, was he there?

10 A. (Witness nodded.)

11 MS. KAPLAN: You've got to say.

12 THE WITNESS: Yes.

13 BY MS. HABBA:

14 Q. And did he deny it?

15 A. Very quietly but he denied 19 in  
16 the same bunch.

17 Q. Prior to releasing this article  
18 with The Cut, did you anticipate that you  
19 might need to sue the defendant to hold  
20 him accountable?

21 A. No, it was the last thing I would  
22 ever think of, would not -- no.

23 Q. Had you consulted with an  
24 attorney and --

25 A. No.

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2 BY MS. HABBA:

3 Q. Were the timing of your  
4 allegations related to the former  
5 president's run for reelection?

6 A. No.

7 Q. Was it something you considered?

8 A. No.

9 Q. How did the defendant's  
10 statements impact your personal life?

11 A. Totally affected it. I lost my  
12 job. I'm looked at as a woman who's  
13 untrustworthy, looked at now as a woman  
14 who can't be believed. I'm looked at as a  
15 woman who was stupid and dumb enough to  
16 have happen to her what happened to her.

17 Q. You just said that you're looked  
18 at as a woman stupid enough to have had  
19 happen to her what happened to her; is  
20 that correct?

21 A. (Witness nodded.)

22 Q. How does that relate to Donald  
23 Trump, the perception rather?

24 A. He raped me and after that  
25 everything I thought was quickly over and

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2 behind me but it turned out not to be so.

3 Q. And you realized this when the  
4 #MeToo movement that we discussed came  
5 out; is that correct?

6 A. Yes.

7 Q. How many times in your life have  
8 you been sexually assaulted or raped?

9 A. When I was a child, when I was 5,  
10 another child, not knowing what he was  
11 doing shoved a stick up my vagina or rock,  
12 I can't remember which, so that was an  
13 assault when I was 5.

14 At Indiana University on a drive  
15 in the country in Brown County, a boy  
16 pulled over and I -- he called me a prick  
17 tease and so I scooted out and jumped out  
18 the car and he caught me and threw me on  
19 the ground, got on top of me and pulled  
20 out a knife.

21 At a military academy, my friend  
22 and I were visiting her parents' friends  
23 who I think he was the dean of admissions  
24 and a boy threw me on the ground and then  
25 chased me through it was called the

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2 military -- chased me across the campus  
3 with his friends cheering him on.

4 I was thrown on the ground when I  
5 was 12 by a neighbor's nephew. Luckily  
6 the mother and the daughter came out and  
7 caught him.

8 Moonves in the elevator. I  
9 didn't include a dentist. There are  
10 people in there I didn't even include.

11 Q. So it's a dentist?

12 A. A dentist.

13 Q. Who is the dentist?

14 A. Oh, I don't remember his name.

15 Q. Was he your dentist?

16 A. Yes. I went to him.

17 Q. Where was that dentist located?

18 A. Pardon?

19 Q. Where was the dentist?

20 A. In New York.

21 Q. And what happened there?

22 A. While he was taking care of my  
23 teeth he would lean in and grind against  
24 my leg but I didn't include stuff.

25 Q. But is there anything else that

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2 you didn't include?

3 A. I can't recall right now.

4 Q. So seven times?

5 A. Growing up, when you're a woman  
6 in the '70s and '80s just walking around  
7 up and down the street, it was a very  
8 different time.

9 Q. So you stated that you believe  
10 the defendant's statements impacted your  
11 employment with Elle Magazine; is that  
12 correct?

13 A. Um-hum.

14 Q. In what way?

15 A. Well, I had an advice column and  
16 that advice column, it had run in the  
17 magazine for 26 years. It was one of the  
18 most popular columns ever in the magazine.  
19 I loved my readers, loved them. They  
20 would pour their hearts out to me and I  
21 loved helping them, they helped me, and  
22 then being called a liar, my entire career  
23 as an advice columnist rested on the fact  
24 that I could be trusted not to give  
25 anybody any bullshit. It had to be

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2 absolutely the truth. So when the  
3 president said I'm a liar, it shook that  
4 whole foundation, that was it.

5 Q. When you say that foundation, you  
6 mean your employment?

7 A. The foundation of trust that a  
8 columnist has with their readers. And  
9 those readers, I loved those readers.  
10 They are the best in the world.

11 Q. Did the readers stop reading?

12 A. I started to receive less  
13 letters.

14 Q. Let's go back to your employment.  
15 Your employment was terminated by Elle  
16 Magazine; correct?

17 A. Um-hum.

18 MS. KAPLAN: You've got to say --

19 THE WITNESS: Yes.

20 BY MS. HABBA:

21 Q. What do you believe the reason  
22 is?

23 A. Because Donald Trump called me a  
24 liar.

25 Q. You were ultimately terminated

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2 from Elle Magazine; right?

3 A. Yes.

4 Q. Do you know when that was?

5 A. Yes. I got the call December  
6 2019 and it took effect in March.

7 Q. So they let you stay on until  
8 March; is that correct?

9 A. I had already written the columns  
10 all the way through March. Also they  
11 wouldn't want me to go because March is  
12 one of their big issues.

13 Q. But if you're saying that because  
14 you were called a liar, the readers  
15 weren't sending you as many letters, why  
16 would they want you on in March for the  
17 big issue?

18 A. Because it had already been  
19 written, edited and it was already at the  
20 factory, at the distributor, had been  
21 printed.

22 Q. Are you done answering?

23 A. (Witness nodded.)

24 Q. Do you believe that the  
25 termination was solely as a result of the



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2 exclusive with New York Magazine.

3 A. Right.

4 Q. Do you know what they are  
5 referencing there?

6 A. Yes, they would have preferred  
7 the excerpt to run in Elle but I decided  
8 to run it in New York Magazine.

9 Q. Tell me who originally approached  
10 you from Elle Magazine regarding your  
11 exclusive with Elle Magazine and your  
12 decision to share it with New York  
13 Magazine.

14 A. I told them after the fact.

15 Q. Why didn't you give your  
16 exclusive to Elle Magazine?

17 A. Because they don't publish  
18 anything of this length. They don't  
19 publish articles about women being raped.  
20 It's just they are very careful about not  
21 upsetting their readers and I don't  
22 believe that they would have run anything  
23 close to what New York ran. They would  
24 have cut it out very -- they wouldn't want  
25 to have their readers upset by concerning

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2 their columnist.

3 Q. Had anybody at Elle Magazine  
4 asked you for the exclusive on your story?

5 A. After they heard I wanted to sell  
6 it to New York, yes, they said let us run  
7 it.

8 Q. And how much did you sell it for  
9 to New York Magazine?

10 A. I think 7,000 -- \$7,000 I think.

11 Q. Did Elle Magazine offer you?

12 A. No.

13 MS. KAPLAN: Just so that  
14 question is clear, you meant offer you  
15 money?

16 MS. HABBA: Yes.

17 THE WITNESS: They offered me  
18 nothing.

19 BY MS. HABBA:

20 Q. They just wanted the exclusive  
21 and you said no?

22 A. Because I didn't believe they  
23 would run a full excerpt.

24 Q. Who discussed the decision to not  
25 allow Elle to distribute the excerpt with

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2 you?

3 A. Well, my agent and I, but it was  
4 pretty much a foregone conclusion we would  
5 go with New York.

6 Q. Who from Elle spoke to you or  
7 your agent about getting the exclusive?

8 A. Oh, they -- who from Elle? Oh,  
9 Emma, I call her Emma Woodhouse, Emma  
10 Rosenblum called the publisher and said  
11 we'd like first rights and the publisher  
12 said no, we're giving it to New York  
13 Magazine.

14 Q. Were you part of that decision?

15 A. I made the decision along with  
16 the publisher and my agent.

17 Q. Even though you worked for Elle  
18 Magazine for over two decades?

19 A. And I was planning to continue to  
20 work for Elle. To me it was a no-brainer.  
21 This is a New York man with a New York  
22 subject about a book about what women  
23 think about men going across the country.  
24 It's a New York story, not an Elle story.

25 Q. Did anybody tell you they were